

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Michael Chase Loftin
Caitlan Nicole Loftin, Debtors**

**Case No. 24-01954-KMS
Chapter 13**

**DEBTOR'S CERTIFICATION AND MOTION FOR ENTRY OF CHAPTER 13
DISCHARGE PURSUANT TO 11 U.S.C. §1328 (a) and (h)**

This motion seeks an order discharging the debtor(s) pursuant to § 1328(a) of the bankruptcy code. If you oppose this motion, you must file a response with the court within twenty-one (21) days from the date listed below in the certificate of service. Your response must set forth the specific factual allegations with which you disagree, and a copy of your response must be served on the debtor(s) and debtor's(s') attorney. If no timely response is filed, the court may grant this motion without holding a hearing. A timely response is necessary for a hearing to be held.

1. By signing below, the debtors certify under penalty of perjury that the following statements are true and correct:
 - A. For cases filed on or after March 10, 2008, we have completed a personal financial management instructional course provided through an agency approved by the United States Trustee and have filed the certificate of completion provided by the course provider (in a joint case, both husband and wife must each complete the course and file a certificate of completion) or the approved personal financial management course provider has notified the court that we have completed a post-petition instructional course concerning personal financial management. **11 U.S.C. § 1328(g)**
 - B. All pre-petition amounts owed by me on domestic support obligation ("Domestic Support Obligation" as defined at 11 U.S.C §101(14A)), if any, have been paid to the extent provided by the plan. All post-petition amounts owed by me on a domestic support obligation, if any, have been paid. **11 U.S.C §1328(a)**
 - C. We have not received a discharge under chapter 7, 11 or 12 of the Bankruptcy Code in a prior case filed during the four-year period preceding the date that the petition was filed in this case. **11 U.S.C. §1328(f)(1)**
 - D. We have not received a discharge under chapter 13 of the Bankruptcy Code in a prior case filed during the two-year period before the date that the petition was filed in this case. **11 U.S.C. §1328(f)(2)**
 - E. We have not been convicted of a felony, the circumstances of which would demonstrate that the filing of this bankruptcy case constituted an abuse of the provisions of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(A)**
 - F. If we owe a debt arising from: (i) any violation of any State or Federal securities laws, regulations or orders, (ii) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security, (iii) a civil remedy under 1964 of Title 18 of the United States Code, or (iv) that caused serious injury or death to another individual in the preceding five (5) years, in the preceding five (5) years, then we have not claimed an exemption for my/our residence in an amount in excess of the statutory

cap as prohibited by §522(q)(1) of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(B)**

G. No proceeding is pending in which we may be found guilty of a felony of the kind described in §522(q)(1)(A) or in which we may be found liable for a debt of the kind described in §522(q)(1)(B). **11 U.S.C. §1328(h)(2)**

H. We have made all payments required by my confirmed Chapter 13 plan.

2. Debtors hereby move the court for the entry of a discharge order in this case.

Signed: <u>/s/ Michael Chase Loftin</u>	<u>04-18-2025</u>
Michael Chase Loftin	Date
 <u>/s/ Caitlan Nicole Loftin</u>	 <u>04-18-2025</u>
Caitlan Nicole Loftin	Date
 <u>/s/ Thomas C. Rollins, Jr.</u>	 <u>04-18-2025</u>
Thomas C. Rollins, Jr., MS Bar No. 103469	Date
Attorney for the Debtors	
The Rollins Law Firm, PLLC	
P.O. Box 13767	
Jackson, MS 39236	
601.500.5533	

3. Mailing address for filing responses:

Jackson Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Thad Cochran US Courthouse
501 E Court St, Ste 2.300
Jackson, MS 39201

Gulfport Divisional Office:
Danny L. Miller, Clerk
United States Bankruptcy Court
Dan M. Russell, Jr. U.S. Courthouse
2012 15th St, Suite 244
Gulfport, MS 39501

CERTIFICATE OF SERVICE

On August 18, 2025, a copy of this pleading was served on each of the persons listed on the attached service list either by prepaid United States mail or via electronic service through the Court's EM/ECF system at the mailing addresses and/or email addresses indicated.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

MICHAEL CHASE LOFTIN
CAITLAN NICOLE LOFTIN

CASE NO: 24-01954

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 4/18/2025, I did cause a copy of the following documents, described below,
Notice and Motion for Entry of Chapter 13 Discharge

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 4/18/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

MICHAEL CHASE LOFTIN
CAITLAN NICOLE LOFTIN

CASE NO: 24-01954

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 4/18/2025, a copy of the following documents, described below,
Notice and Motion for Entry of Chapter 13 Discharge

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 4/18/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 24-01954
SOUTHERN DISTRICT OF MISSISSIPPI
FRI APR 18 10-1-25 PST 2025

ALLY CAPITAL
CO OLIVIA SPENCER ESQ
1855 CRANE RIDGE DRIVE SUITE D
JACKSON MS 39216-4944

ALLY CAPITAL CO AIS PORTFOLIO SERVICES
LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

~~EXCLUDE~~

~~(U)REGIONS BANK~~

~~EXCLUDE~~

~~US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MS 39201 5036~~

~~EXCLUDE~~

~~(D)ALLY CAPITAL
CO AIS PORTFOLIO SERVICES LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118 7901~~

ALLY FINANCIAL INC
ATTN BANKRUPTCY
500 WOODARD AVE
DETROIT MI 48226-3416

(P)BELMONT FINANCE LLC
300 PLOVER ROAD
PLOVER WI 54467-9401

BROOKHAVEN RADIOLOGY PLLC
CO FRANKLIN SERVICE INC
PO BOX 3910
TUPELO MS 38803-3910

CAPITAL ONE
ATTN BANKRUPTCY
PO BOX 30285
SALT LAKE CITY UT 84130-0285

CAPITAL ONE NA
BY AIS INFOSOURCE LP AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

CAVALRY SPV I LLC AS ASSIGNEE OF
CITIBANK
PO BOX 4252
GREENWICH CT 06831-0405

CREDIT BUREAU SYSTEMS
25 JEFFERSON ST
STE 200A
CLARKSVILLE TN 37040-4657

CREDIT COLLECTION
ATTN BANKRUPTCY
725 CANTON ST
NORWOOD MA 02062-2679

CREDIT ONE BANK
6801 CIMARRON RD
LAS VEGAS NV 89113-2273

FAST FUND
PO BOX 193
BATESLAND SD 57716-0193

INTERNAL REVENUE SERVI
CENTRALIZED INSOLVENCY
PO BOX 7346
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVI
CO US ATTORNEY
501 EAST COURT ST
STE 4430
JACKSON MS 39201-5025

KINGS DAUGHTERS MEDICA
427 US51
BROOKHAVEN MS 39601

NATALIE BROWN ESQ
RUBIN LUBLIN LLC
FOR REGIONS BANK
3145 AVALON RIDGE PLACE SUITE 100
PEACHTREE CORNERS GA 30071-1570

ONE MAIN FINANCIAL
ATTN BANKRUPTCY
PO BOX 3251
EVANSVILLE IN 47731-3251

ONEMAIN FINANCIAL GROUP LLC
PO BOX 3251
EVANSVILLE IN 47731-3251

PERFECTION COLLECTION
313 E 1200 S
SUITE 102
OREM UT 84058-6910

(P)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

REGIONS BANK
PO BOX 1860
MEMPHIS TN 38101-1860

REGIONS MORTGAGE
ATTN BANKRUPTCY
PO BOX 18001
HATTIESBURG MS 39404-8001

STATCARE PLLC
CO FRANKLIN SERVICE INC
PO BOX 3910
TUPELO MS 38803-3910

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

SUNRISE CREDIT SERVICE
ATTN BANKRUPTCY
260 AIRPORT PLAZA
FARMINGDALE NY 11735-3946

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENW
WASHINGTON DC 20530-0001

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6 430
JACKSON MS 39201-5022~~

(P)VERITAS INSTRUMENT RENTAL
PO BOX 950
PINELLAS PARK FL 33780-0950

CAITLAN NICOLE LOFTIN
140 STONYBROOK TRAIL SE
BOGUE CHITTO MS 39629-4238

~~EXCLUDE~~

~~(P)DAVID RAWLINGS
ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE
PO BOX 566
HATTIESBURG MS 39403-0566~~

DEBTOR

MICHAEL CHASE LOFTIN
140 STONYBROOK TRAIL SE
BOGUE CHITTO MS 39629-4238

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~